

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA)	
)	CASE NO. 5:16-cv-01028
Plaintiff,)	
)	JUDGE BENITA Y. PEARSON
vs.)	MAGISTRATE GEORGE J. LIMBERT
)	
RICHARD N. SWANSON, et al.,)	<u>ANSWER OF DEFENDANT</u>
)	<u>PORTAGE COUNTY TREASURER</u>
Defendants.)	
)	

Now comes Treasurer of Portage County, Ohio, by and through counsel, and hereby submits his Answer to the Complaint filed by the United States of America, Plaintiff herein as follows:

1. Defendant admits the allegations contained in paragraphs 1, 2, 5, 12, 24, and 39 of the Complaint.
2. In answering paragraph 34, Defendant admits that the Revocation of Affidavit Certificate of Non-Attachment of Federal Tax Lien was recorded on April 11, 2016 with the Portage County Recorder as Instrument No. 201605064. In further answering said paragraph, Defendant is without sufficient information or belief as to the truth of the remaining allegations cited therein, and therefore, denies the same.

3. Defendant is without sufficient information or belief as to the truth of the allegations contained in paragraphs 3, 4, 6, 7, 8, 9, 10, 11, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 25, 26, 27, 28, 29, 30, 31, 32, 33, 35, 36, 37, 38, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, and 55 of the Complaint and therefore denies the same.

3. Defendant denies all remaining allegations contained in the complaint that have not been denied.

Respectfully submitted,

VICTOR V. VIGLUICCI (0012579)
Portage County Prosecuting Attorney

/s/ Allison Blakemore Manayan
ALLISON BLAKEMORE MANAYAN (0042026)
Assistant Prosecuting Attorney
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that, on July 1, 2016, a copy of the Answer of Defendant, Portage County Treasurer, was electronically filed. Notice of this filing will be sent to all registered parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

As to the parties who are not registered, the undersigned certifies that a copy of the Answer of Defendant, Portage County Treasurer has been sent by regular U.S. Mail on this 30th day of June 2016 to:

Mortgage Electronic Registration Systems,
Inc.
c/o CT Corporation System
1300 East Ninth Street
Cleveland, Ohio 44114

First Franklin A Division of National City
Bank of IN
c/o John Husted, Ohio Secretary of State
180 East Broad Street, 16th Floor
Columbus, Ohio 43215

Laurel Canyon Holdings, LLC.
c/o Shawn G. Pearson, Registered Agent
6100 Neil Road
Suite 500
Reno, Nevada 89511

First Merit Corporation a/k/a First Merit Bank
c/o Statutory Agent Corporation
52 E. Gay Street
Columbus, Ohio 43215

/s/ Allison Blakemore Manayan
ALLISON BLAKEMORE MANAYAN (0042026)
Assistant Prosecuting Attorney